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Attorneys for Plaintiff
VERIGY US, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;
WESLEY MAYDER, an individual; SILICON
TEST SYSTEMS, INC., a California Corporation;
and SILICON TEST SOLUTIONS, LLC, a
California Limited Liability Corporation,
inclusive,

Defendants.

Case No. C07 04330 RMW (HRL)

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Judge: Honorable Howard R. Lloyd
Ctrm: 2

Complaint Filed: August 22, 2007
Trial Date: None Set

AND RELATED CROSS-ACTIONS

1 Now before the Court is Verigy's Administrative Motion For Leave To File Documents
 2 Under Seal. Upon consideration of the Administrative Motion for Leave to File Documents Under
 3 Seal and the supporting declaration of Colin G. McCarthy filed therewith, the Court finds there to
 4 be good cause for granting Plaintiff's request to file documents under seal.

5 GOOD CAUSE having been shown, the Court finds that:

- 6 (1) The parties possess overriding confidentiality interest that overcomes the
 7 right of public access to the record in the following documents:
 - 8 a. Portions of Verigy's Notice of Motion, Memorandum of Points and
 9 Authorities ("MPA"), and Motion to Compel Production of
 10 Documents from Silicon Test Systems Inc. in Response to Verigy's
 11 4th Set of Requests for Production (collectively "MCP on 4th
 12 RFP");
 - 13 b. Exhibits A, C, and D to the Declaration of Colin G. McCarthy in
 14 support of MCP on 4th RFP;
 - 15 c. Portions of Verigy's Notice of Motion, MPA, and Motion to
 16 Compel Discovery Responses from STS, Inc. Re 2nd Set of
 17 Interrogatories and 1st Set of Requests for Admissions (collectively
 18 "MCP on Interrogatories and RFAs");
 - 19 d. Exhibits A, B, C and D to the Declaration of Colin G. McCarthy in
 20 support of MCP on Interrogatories and RFAs;
 - 21 e. Exhibits G and H to the Declaration of Colin G. McCarthy in
 22 Support of Verigy's Notice of Motion and Motion to Compel
 23 Production of Documents from Defendants in Response to 3rd & 5th
 24 Sets of Requests for Production. ("MCP on 3rd & 5th RFP").
- 25 (2) The parties' overriding confidentiality interests support sealing the record;
- 26 (3) A substantial probability exists that the parties' overriding confidentiality
 27 interest will be prejudiced if the record is not sealed;
- 28 (4) The proposed sealing is narrowly tailored; and

1 (5) No less restrictive means exist to achieve this overriding interest.

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4 IT IS THEREFORE ORDERED that Verigy's Motion for Leave to File Documents Under
5 Seal is GRANTED.

6 **IT IS SO ORDERED.**

7 Dated: _____, 2008

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Honorable Howard R. Lloyd
UNITED STATES MAGISTRATE JUDGE